

REMARKS

Applicants thank the Examiner for the courtesies extended to Applicants' representative at the interview on November 1, 2007. During the interview, the rejections contained in the Office Action mailed on September 4, 2007, were discussed. The substance of the interview is incorporated into this Reply.

In the Office Action,¹ the Examiner rejected claims 1-29 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,643,625 to Acosta et al. ("Acosta") in view of EP 0919942 A2 by Sykes et al. ("Sykes").

In this response, Applicants have amended independent claims 1, 10, 14, 19-22, and 26 to expedite prosecution of this application and without acceding to any of the rejections. Claims 1-29 remain pending and under current examination.

Applicants respectfully submit that the outstanding § 103(a) rejection should be withdrawn at least because the claims have been amended in accordance with the Examiner's suggestion at the interview. Indeed, the Interview Summary states that the "[r]ejection under [§ 103(a)] over Acosta in view of Sykes will be withdrawn" if the claims are amended as suggested by the Examiner. Because the claims have been so amended, Applicants respectfully request that the Examiner withdraw the rejection of claims 1-29 and allow these claims.

In addition, claims 1-29 are allowable because a *prima facie* case of obviousness has not been established. The differences between the prior art and Applicants' claims

¹ The Office Action contains a number of statements reflecting characterizations of what the Examiner considers to be prior art and Applicants' claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

are such that it would not have been obvious for one of ordinary skill in the art at the time of the invention to modify the prior art to arrive at Applicants' claimed invention.

Claim 1 recites a method for processing loan information using a financial system and recites a combination of features including receiving loan information for one or more loans from one or more source systems; storing the loan information in one or more staging tables, the staging tables organizing, for each loan, the loan information into categories; establishing one or more triggers, each trigger identifying one or more rules; identifying one or more satisfied triggers by evaluating the loan information stored in the one or more staging tables associated with the one or more triggers being evaluated; retrieving, from the one or more staging tables, the loan information from each category required to execute the one or more rules for the satisfied triggers; executing the one or more rules on the retrieved loan information; and updating the loan information using the results of executing the one or more rules. Neither Acosta nor Sykes, taken individually or in combination, discloses this combination of features.

For example, Acosta does not disclose at least “storing the loan information in one or more staging tables, the staging tables organizing, for each loan, the loan information into categories,” as recited in claim 1 (emphasis added). The Examiner alleges that Acosta's “loan origination records” constitute the claimed “staging tables.” (Office Action at 3.) Applicants respectfully disagree because Acosta's “loan origination records,” even if they could be considered “staging tables,” do not “organiz[e], for each loan, the loan information into categories,” as recited in claim 1. Instead, Acosta's loan

origination records contain loan origination records for all loans and are not separated “for each loan . . . into categories,” as required by claim 1.

Acosta also fails to teach or suggest the claimed “identifying one or more satisfied triggers by evaluating the loan information stored in the one or more staging tables associated with the one or more triggers being evaluated,” as recited in claim 1. The Examiner acknowledges as much, but relies on Sykes for allegedly disclosing the claimed “triggers.” (Office Action at 3.) Although Sykes discloses “triggers,” Sykes does not teach or suggest “identifying one or more satisfied triggers by evaluating the loan information stored in the one or more staging tables associated with the one or more triggers being evaluated,” as recited by claim 1 (emphasis added). Instead, Sykes discloses searching an entire data warehouse, not just the “staging tables associated with the one or more triggers being evaluated,” as required by claim 1. (Sykes, paragraph 0021.)

One of ordinary skill in the art at the time of the invention would not have found it obvious to modify Acosta and Sykes to arrive at the claimed invention. The Examiner asserts that one of skill in the art would have found it obvious to generally use triggers, as disclosed by Sykes, to evaluate Acosta's loan origination records and loan servicing records. However, Applicants' claimed invention utilizes one or more staging tables that “organiz[e], for each loan, the loan information into categories,” as recited by claim 1. By organizing the loans into a plurality of categories and storing the loan information for each category into separate staging tables (e.g., 3020, 3030, etc. in Fig. 3), the claimed

invention allows data from different sources utilizing different formats to be stored in a common, organized format, for each loan.

Moreover, combining Sykes disclosed searching of data to find triggers with the teachings of Acosta would result in wasted resources and increased search time.

Sykes discloses “[e]vent detectives . . . are executed against the data warehouse at regular intervals . . . to end up with a set of event triggers.” (Sykes, paragraph 0021.)

That is, Sykes evaluates the entire data warehouse for each trigger. Applying such a teaching to Acosta would result in searching both Acosta’s loan origination record and loan servicing record for each trigger. In terms of Applicants’ invention, even assuming

Acosta’s loan origination record or loan servicing record were “staging tables” (which Applicants do not concede), the combination of Sykes and Acosta would cause every staging table to be searched for each trigger. This repetitive searching for each trigger

increases processing time, causes delays in identifying satisfied triggers, and fails to implement a method where loan information has been organized into categories, as

recited by claim 1. In contrast, claim 1 recites a method that only searches the organized staging tables that are relevant for each trigger being evaluated. In

particular, claim 1 recites “identifying one or more satisfied triggers by evaluating the loan information stored in the one or more staging tables associated with the one or

more triggers being evaluated” (emphasis added). Acosta and Sykes, taken individually or in combination, fail to teach or suggest such a combination, nor would one of ordinary skill in the art have found it obvious to modify Acosta and Sykes to arrive at the claimed combination.

Accordingly, no *prima facie* case of obviousness has been established with respect to claim 1. Independent claims 10, 14, 19-22, and 26, although of different scope, recite features similar to those of claim 1, and thus, are also allowable at least for the reasons stated above with respect to claim 1. Claims 2-9, 11-13, 15-18, 23-25, and 27-29 depend from independent claims 1, 10, 14, 22, or 26, respectively, and are also allowable at least because of their dependency on the independent claims, which are allowable for the reasons set forth above. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1-29 under 35 U.S.C. § 103(a) as being unpatentable over Acosta in view of Sykes.

Should the Examiner continue to dispute the patentability of the claims after consideration of this response, Applicants request that the Examiner contact Applicants' undersigned representative by telephone to discuss any remaining issues or to resolve any misunderstandings.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

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By: 

Nathan A. Sloan
Reg. No. 56,249
202.408.4312